

STEVEN G. KALAR
Federal Public Defender
ANGELA M. HANSEN
Assistant Federal Public Defender
555 - 12th Street, Suite 650
Oakland, CA 94607-3627
Telephone: (510) 637-3500
Counsel for Defendant HAYES

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-15-00033 JD (KAW)
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER TEMPORARILY MODIFYING
vs.)	CONDITIONS OF PRETRIAL RELEASE
)	
LASHUNDRIA HAYES,)	<u>The Honorable Kandis A. Westmore</u>
)	
Defendant.)	
)	

Defendant, LaShundria Hayes, through her counsel, Assistant Federal Public Defender Angela M. Hansen, and Assistant United States Philip Kopczynski, stipulate and agree that the Court should modify the conditions of Ms. Hayes' release to allow her to travel to Las Vegas, Nevada for three days in early September.

On January 29, 2015, Ms. Hayes made an initial appearance in the above-captioned case and she was arraigned on an Indictment charging her with access device fraud and other crimes. On that same date, the Court released Ms. Hayes on an unsecured bond. Ms. Hayes has been on pretrial release for nearly eight months without incident.

Ms. Hayes respectfully requests that the conditions of her pretrial release be temporarily modified to allow her to travel out of the district to Las Vegas, Nevada for a family reunion on

1 September 4, 2015 through and including September 7, 2015. Ms. Hayes is driving and will
2 need also to travel through other districts to arrive at her destination. Her supervising Pretrial
3 Services Officer, Victoria Gibson, has no objection to this request, and Ms. Hayes plans to
4 provide Ms. Gibson with the exact address of where she will be staying while out of the district.

5 Government counsel has no objection to this request to temporarily modify Ms. Hayes'
6 pretrial release. The parties agree that all other conditions of Ms. Hayes' pretrial release shall
7 remain in effect.

8
9 August 19, 2015

/S/
ANGELA M. HANSEN
Assistant Federal Public Defender

10
11 August 19, 2015

/S/
PHILIP KOPCZYNSKI
Special Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LASHUNDRIA HAYES,

Defendant.


No. CR-15-00033 JD (KAW)

~~PROPOSED~~ ORDER TEMPORARILY
MODIFYING CONDITIONS OF
PRETRIAL RELEASE

The Honorable Kandis A. Westmore

For the reasons set forth in the stipulation of the parties above, it is ordered that Pretrial Services is authorized to allow defendant LaShundria Hayes to travel out of the district to Las Vegas, Nevada, and to travel through the districts on her drive between the Northern District of California and her destination, on September 4, 2015 through and including September 7, 2015. All other conditions of Ms. Hayes' pretrial release shall remain in effect.

August 19, 2015


United States Magistrate Judge

